

Exhibit 16

Privacy Statement for Application Services

Last Updated May 2, 2022

Introduction

Your privacy is important to us. This Privacy Statement describes how we, General Motors Holdings LLC and its affiliates (“GM” or “we” or “us”), collect, use, and share information (including the location of your OnStar-equipped eligible vehicle (your “Vehicle”) and how your Vehicle is used) when you download this software application (“Application”) to your phone or other Internet-connected device (your “Device”) and when you use the services available through the Application.

This Application provides access to various functions and services including accessing vehicle functions or locating your Vehicle as well as the ability to access third party service provider services (the “Application Services.”)

It is your responsibility to ensure that all users of your Vehicle know that anyone with access to the Application Services through your Device may be able to access information about your account and your Vehicle, including the location of your Vehicle.

In some cases, this Application may let you grant other people access to your Vehicle or the Application Services. If you grant access, those people may be able to view your Account Information, Vehicle-Related Information and Driving Information, including location of your Vehicle.

This Privacy Statement incorporates the OnStar Privacy Statement, which is posted at www.onstar.com/privacy, and which also applies to your use of other OnStar services. Together these privacy statements describe our privacy practices for the Application Services. Capitalized terms, if not defined in this Privacy Statement, are defined in the OnStar Privacy Statement.

The links below are provided for your convenience to highlight main sections. You may click the links to directly access associated content or continue scrolling to view this Privacy Statement.

- Introduction
- Information We Collect
- Use of Your Information
- Restricting the Collection of Location and Speed Information
- Sharing of Information
- Tracking Technologies
- Limiting Marketing and Promotional Communications
- Biometric Authentication
- Security
- Changes to This Privacy Statement
- Access
- How to Contact

Information We Collect

We collect information from you as described in the OnStar Privacy Statement. In addition, when you download the Application or use the Application Services, the types of your information that we may collect include:

- Device information, such as the location of your Device, Device type, Device operating system, Internet Protocol (IP) address, unique identifier, type of browser, Internet service provider, information about your use of the Application, and phone number;
- Information about your use of the Application, including screen view time, scrolling, specific actions to activate features or otherwise navigate the application, reactions to alerts, searches, and your interactions with in-application marketing offers;
- Account information, vehicle-related information, and driving Information, such as the location and speed of your Vehicle based on GPS; and
- Information about you from additional online and offline sources including commercially or publicly available third-party sources.

We collect and treat this information as described in the OnStar Privacy Statement.

Use of Your Information

We use the information we collect as described in the OnStar Privacy Statement. For example, we use the information to:

- Provide the Application Services;
- Communicate with you about your account or the Application Services; and
- Provide you with marketing offers that may interest you, including offers relevant to the location of your Device;
- Improve, troubleshoot, and evaluate the use of our products and Services (including the Application); and
- Conduct research.

Restricting the Collection of Location and Speed Information

You can restrict our access to and collection of the location of your Device by disabling location-sharing on your Device, if that feature is available on your Device.

Some of the Application Services require access to and collection of the location and speed of your Vehicle. We collect location and speed of your Vehicle when you access or use the Application Services, or as otherwise disclosed in the OnStar Privacy Statement. You can restrict our access to and collection of location and speed of your Vehicle, or the location of your Device, by not using the Application Services.

Sharing of Information

We may share information we collect about you as described in the OnStar Privacy Statement. For example, we share information with necessary third parties when you use the Application to make

requests for third party or related services available through the Application, such as for dealer maintenance appointments or roadside assistance. We may share the location of your Device in the same manner as we share location and speed of your Vehicle. For example, we may share the location of your Device with:

- third party service providers working on our behalf,
- emergency service providers,
- others when required by law, and
- those you ask us to share this information with.

We may also share the location of your Device when necessary to provide the Application Services to you; to comply with legal obligations; to protect the safety and rights of you and others; for product safety and security purposes; and for the purposes described in the OnStar Privacy Statement.

Tracking Technologies

GM may use device tracking technologies that allow us to identify you on your Device in a unique manner, such as use of IP address or VIN, to gather information about your activity within the Application Services, such as demographic data, browser type, pages visited, activities conducted on the page, and the day and time of your visit. GM uses this information, sometimes across devices, to measure your activity, remember your preferences, maximize and improve the performance of our products and services, and customize your experience. For more information about GM's use of tracking technologies, please see the OnStar Privacy Statement.

Limiting Marketing and Promotional Communications

You may choose to limit the marketing and promotional communications we send you. You can do this by contacting us at 1.888.4ONSTAR and selecting your contact preferences. We will also provide opt-out instructions in all of our promotional communication channels; for example, an unsubscribe option will appear at the bottom of all marketing-related emails or you can reply "Stop" to unsubscribe from a specific text message campaign.

Biometric Authentication

If you elect to use biometric authentication (e.g. Touch ID, fingerprint scanning, or Face ID) you should refer to your Device manufacturer's product information regarding biometric authentication. We do not collect biometric data or control biometric authentication on your Device. After successful authentication, you will be given the choice to enable biometric authentication on your Device to access Application Services in the future. If you change your mind, you may disable this feature through your Device settings or by logging out of Application Services and turning biometric authentication off.

Security

We use technical, administrative, and physical safeguards designed to protect your information and we require third party service providers to maintain similar safeguards against loss, misuse, and unauthorized access, disclosure, alteration, destruction, or theft of your information.

Changes to This Privacy Statement

We reserve the right to update this Privacy Statement from time to time for any reason. We will notify you of a material change to this Privacy Statement by placing a notice on www.onstar.com/privacy or within the Application on your Device, or by notifying you via email or postal mail.

Access

If you would like to access or ensure the accuracy of your Account Information, please contact us as described below.

How to Contact

OnStar For general questions about the Application Services, visit www.onstar.com or call us 1.888.4.ONSTAR (1.888.466.7827). If you have questions about our privacy practices, contact the Privacy Manager by email at privacymanager@OnStar.com, by mail to OnStar Privacy Manager, P.O. Box 1027, Warren, Michigan, 48090-1027, or by calling us at 1.877.299.1372